

I am opposed to this action which allows for the introduction of many new signal radiators within the shortwave spectrum into a very large and widely distributed nationwide antenna system also known as our nation's power grid. The shortwave frequency spectrum is a unique resource with many uses beneficial to society. The unique long distance communications capabilities of the shortwave spectrum are often most apparent in emergency situations. The shortwave spectrum is not dependent on sophisticated repeaters or other complex systems which can fail in crisis. In the era we live in today, it is vitally important that we in this nation maintain communications capabilities that are not totally dependent on sophisticated computer controlled mechanisms. Introduction of widespread signals within the shortwave spectrum into our nation's power grid has the potential to render most shortwave communications capability very ineffective. Injecting wideband radio signal interference into our power grid would seem to be an ideal way to totally jam shortwave communications throughout our entire nation. A terrorist would be delighted to have such a capability within their hands to disable our shortwave communications capability. I am aware that we have many modern communications capabilities that do not in any way depend on the shortwave spectrum, but shortwave spectrum provides a simple and effective way to bridge long distances, particularly in time of crisis. It is imperative that we do not pollute this spectrum. The BPL interests have as a goal to provide broadband to the entire nation. I submit that there are many alternative ways to do so that are more effective, less prone to generate or receive interference, and in the long term a much better solution. The introduction of BPL seems to be shortsighted, particularly when one considers the multitude of better alternatives. Recent test demonstrations of BPL have shown extensive and broad spectrum interference to the shortwave spectrum. If BPL is rolled out nationwide, will the FCC be willing to close it down when widespread interference occurs? The current idea is that BPL can exist within Part 15 limits. Part 15 limitations are provided to allow unlicensed operations without interference to licensed operations. Test demonstrations have already shown that BPL does cause interference to licensed services. It seems the question has already been answered in those test demonstrations. To allow BPL is to allow widespread radio signal pollution within the radio spectrum. BPL is unnecessary and is a potential source of significant radio spectrum pollution. If BPL is truly to be operated as a Part 15 device, it is subject to and potentially will be adversely affected by licensed services. Many very suitable alternatives exist for delivering broadband to the nation that do not have the negative impact of BPL. BPL seems to be one of those things dreamed up by a marketing team without ever considering the realistic engineering issues. Any competent radio engineer would see a multitude of potential problems with the BPL approach and could not realistically recommend BPL if any reasonable alternative approach existed. Many commercially successful alternative approaches are already in place and given time will succeed in providing broadband to anyone in the nation who wants it. There is no need to go forward with BPL and pollute the shortwave radio spectrum.